

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Dennis Mario Rivera

Plaintiff

v

The Coca-Cola Company, et als

Defendants

CASE No.: CASE No.: 13-
1426(PAD)

Copyright Infringement

Plaintiff Demands
Trial By Jury

The Coca-Cola Company

Third Party Plaintiff

v

OM2 Trade Solutions, Inc.

Third Party Defendant

JOINT PROPOSED SCHEDULE

TO THE HONORABLE COURT:

COMES NOW, plaintiff, **Dennis Mario Rivera**; co-defendants, **The Coca Cola Company and CCI Limited Partnership d/b/a Coca Cola Puerto Rico Bottlers; Universal Insurance Company and OM2 TRADE SOLUTIONS, INC. (ALSO AS THIRD PARTY DEFENDANT)**, and respectfully submit this Joint Proposed Scheduled pursuant to the Order on Docket 134:

The parties have reached the following agreements in order to submit this Joint Proposed Schedule:

I. Amendments to Pleadings and to add parties:

- a. All parties will have until August 30, 2014 to amend their pleadings and/or add additional parties.

II. Rule 26 disclosures

- a. The parties will exchange their initial disclosures within 14 days of the last Answer to the Amended Complaint of the parties currently in the action.

III. Conclusion of Discovery

- a. Written Discovery-The parties will exchange their initial set written discovery by Interrogatories and Production Requests by September 15, 2014. The parties will provide their answer to the written discovery pursuant to the Federal Rules of Civil Procedure. The deadline for service of Requests for Admissions is 30 days after the last answer to by Interrogatories and Production Requests is served.
- b. Depositions- The parties agree that all depositions of facts witnesses will be concluded on or before March 30, 2015. The deposition schedule of

the fact witnesses will be coordinated by the parties as needed and required.

c. Experts-

- i. Plaintiff will have until March 30, 2015 to submit all expert reports from experts to be announced with their answers to written discovery.
- ii. All other co-defendants and third party defendants will have until April 30, 2015 to depose plaintiff's experts.
- iii. All other co-defendants and third party defendants will have until May 15, 2015 to announce their experts.
- iv. All other co-defendants and third party defendants will have until June 15, 2015 to serve their expert reports.
- v. Plaintiff will then have until June 15, 2015 to depose co-defendants and third party defendants' experts.

IV. Filing of Motion for Summary Judgment

- a. All parties will have until September 15, 2015 to file Motion for Summary Judgment. The FRCP will govern oppositions, Replies and Sur Replies.

V. Pre-Trial Conference

- a. The parties propose the date of November 18, 2015 for the Pre-trial Conference.

VI. Proposed Pre Trial Order

- a. The parties further agree that the Joint Pre-Trial shall be filed no later than November 8, 2015.

VII. Consent to Magistrate

The parties have not agreed to consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. §636.

VIII. Consent to File

All Co-defendants and Third Party defendants give their consent for the undersigned attorney to electronically file this present motion.

WHEREFORE, it is respectfully requested that this Honorable Court accept this Proposed Joint Schedule.

RESPECTFULLY SUBMITTED.

We hereby certify that, on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

In San Juan, Puerto Rico, this 30th day of June, 2014.

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